

July 17, 2014

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Acting General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

2014 JUL 18 PM 12: 58

OFFICE OF GENERAL  
COUNSEL

Re: Weston Wamp and Weston Wamp for Congress

MUR # 6853

To Whom It May Concern:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this letter as a Complaint against Weston Wamp and Weston Wamp for Congress ("the Committee") for operating in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations, as described below.

Facts

I am a constituent in the 3<sup>rd</sup> Congressional District of Tennessee. While reading a newspaper article in the Chattanooga Times Free Press (enclosed), I learned that Weston Wamp has been on a paid leave of absence while campaigning in my district. I then looked up the campaign financial disclosure (also enclosed) filed by the Committee and discovered that he was paid \$24,000 while actively employed by the Lamp Post Group in 2013, but his reported income as of May for the year 2014 was \$67,203.

My concern is that Weston Wamp is being paid to run for Congress and that he is receiving political contributions that are not reported as such.

Conclusion

Upon information and belief, and based upon the facts relayed herein, Weston Wamp and Weston Wamp for Congress have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations. Accordingly, I respectfully request that the Commission conduct an immediate investigation into the violations outlined above and impose the maximum penalty under law.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,  
Ralph V. Mann

Signal Mountain, Tn 37377

Sworn to and subscribed before me this 17<sup>th</sup> day of July, 2014.

Notary Public

My Commission Expires: 11/13/16





Filing ID #10002035

# FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • B-106 Cannon Building • Washington, DC 20515

## FILER INFORMATION

Name: Thomas Weston Wamp  
Status: Congressional Candidate  
State/District: TN03

## FILING INFORMATION

Filing Type: Candidate Report  
Filing Year: 2014  
Filing Date: 05/14/2014

## SCHEDULE A: ASSETS AND "UNEARNED" INCOME

Asset	Owner	Value of Asset	Income Type(s)	Income Current Year to Filing	Income Preceding Year
First Tennessee Bank		\$50,001 - \$100,000	Interest	\$1 - \$200	\$1 - \$200

Wamp Strategy, LLC \$1,001 - \$15,000 None

LOCATION: Chattanooga/Hamilton, TN, US

DESCRIPTION: Participant in Wamp Strategy, LLC, a limited liability corporation.

## SCHEDULE C: EARNED INCOME

Source	Type	Amount Current Year to Filing	Amount Preceding Year
Lamp Post Group	Salary	\$67,203	\$24,000

## SCHEDULE D: LIABILITIES

None disclosed.

## SCHEDULE E: POSITIONS

# Wamp's work status prompts questions

■ If he's on paid leave, pay could count as contribution.

By LOUIE BROGDON  
STAFF WRITER

If 3rd District congressional candidate Weston Wamp has been on paid leave from Lamp Post Group — as a founding partner said early this month — he could find himself in an election finance nightmare.

If he was paid for times he wasn't working, that could be counted as a campaign contribution, said Larry Nobel, a lawyer for Campaign Legal Center and former general counsel for the Federal Election Commission.



Weston Wamp

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■ Michelle Nunn to report \$3.45 million in contributions. B4

"When you are doing a job that is a regular job that has defined duties, and you aren't doing it, it's a campaign contribution,"

"It could also even be an illegal contribution," he said, because corporations can't make political donations to candidates.

But another partner at the business incubator said Tuesday the company doesn't offer paid leave, and that his colleague misspoke. He said Wamp is working remotely.

Wamp is challenging U.S. Rep. Chuck Fleischmann in the Aug. 7 Republican primary. The winner will face Democratic candidate Mary Headrick in November.

FEC rules say a candidate's normal salary or wages are considered personal funds and aren't directly tied to the campaign.

"However, compensation paid to a candidate in excess of actual hours worked is generally considered a contribution from the employer," according to FEC rules. If a complaint was filed and found valid, he could have to repay the money.

On July 3, after announcing a \$300,000 personal contribution to the Character Counts PAC to help Wamp's campaign, Lamp Post founder Allan Davis said Wamp had been on paid leave since he hit the campaign trail in January. And when asked Tuesday, Davis again said Wamp was on paid leave.

But Jack Studer, also a

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## Wamp

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Lamp Post partner, said Davis was mistaken.

"We don't have a paid leave status — he's not in it. If there is one, I want to get in. It sounds like a pretty sweet deal," Studer said. "Allan is obviously one of our founders and does great work here, but he's not a detail guy."

Studer said Wamp has been working for the company, just not at the office or during traditional work hours.

As communication director Wamp works with

said.

"He continues to work with other companies who need him. But he's working more remotely. His schedule has obviously flexed a lot to make up for that workload," Studer said. "If he doesn't need to sleep and can run a campaign at the same time, more power to him."

Wamp, who was campaigning in Campbell County on Tuesday, also said he's been hard at work.

"For the six-and-a-half months I've been campaigning, I've been active at Lamp Post. I've been working remotely, I've been in and out of the office," Wamp said. "Obvi-

day operations and was probably not aware Wamp was working on the road.

Wamp and Davis are prohibited from interacting, since Davis has donated to a political action committee to help Wamp get elected.

Studer said Lamp Post has been careful about that.

"Obviously when Allan told us he was going to be doing the Character Counts thing ... we also needed to put some walls up between he and Weston," Studer said.

Neither Wamp nor Fleischmann had filed second-quarter federal campaign finance by press time Tuesday. The filing dead-